



THE CITY OF NEW YORK
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September 22, 2022

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

John G. Koeltl, U.S.D.J.

9/22/22

Re: Jamel Purnell v. City of New York, et al., 22 Civ. 5956 (JGK)

Your Honor:

I am a Senior Counsel in the office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York and the attorney assigned to the above-referenced matter. I write on behalf of the Office of the Corporation Counsel City of New York to respectfully request the Court grant a sixty-day enlargement of time to respond to the Court's Valentin Order, from September 26, 2022 to November 25, 2022. This is the first such request. Defendant was unable to obtain plaintiff's position on this request due to his incarcerated status.

By way of background, plaintiff, who is proceeding *pro se*, is alleging, *inter alia*, that he was subjected to excessive force by Correction Officers on or about July 4, 2021 who then failed to provide medical attention. (See ECF No. 2). Plaintiff filed this lawsuit on July 11, 2022. (*Id.*). On July 28, 2022, the Court ordered this Office to identify the unidentified individuals referenced in plaintiff's complaint and provide their identities to the Court and plaintiff by September 26, 2022. (See ECF No. 10). The defendant City filed an executed waiver of service on August 29, 2022. (See ECF No. 9).

Presently, this Office is awaiting pertinent documents from the New York City Department of Correction regarding plaintiff's allegations, the plaintiff, and employee records. Until such time this Office has received the documents and releases it has requested from DOC and plaintiff, the defendant will be unable to respond to the Court's Valentin Order. Accordingly, defendant requests this extension of time in order to obtain the relevant documents in order to respond to the Valentin Order.

Therefore, defendant respectfully requests the Court grant a sixty-day enlargement of time to respond to the Court's Valentin Order, from September 26, 2022 to November 25, 2022.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Joseph Zangrilli

Senior Counsel

Special Federal Litigation Division

cc: **VIA FIRST-CLASS MAIL**

Jamel Purnell

Plaintiff Pro Se

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